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SUPREME COURT  
STATE OF WASHINGTON  
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IN THE SUPREME COURT  
OF THE STATE OF WASHINGTON

IN RE THE PERSONAL RESTRAINT  
PETITION OF:

NO. 82363-4

(Consolidated with Case No. 83923-9)

STATEMENT OF ADDITIONAL  
AUTHORITY

RONNIE JACKSON JR.,

Petitioner.

Pursuant to RAP 10.8, Respondent, State of Washington, respectfully submits the following as additional authority as to cases that provide guidance as to when - in cases that predated *Blakely*- it would be appropriate for a trial court to impose a firearm enhancement when the jury had returned a deadly weapon special verdict:

1. *Neder v. United States*, 527 U.S. 1, 16-20, 119 S. Ct. 1827, 144 L.Ed.2d 35 (1999).


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
2. **State v. Brown**, 147 Wn.2d 330, 339-44, 58 P.3d 889 (2002).

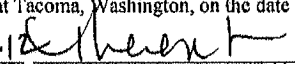
Dated: January 26, 2012.

MARK LINDQUIST  
Pierce County  
Prosecuting Attorney

  
KATHLEEN PROCTOR  
Deputy Prosecuting Attorney  
WSB # 14811

Certificate of Service:

The undersigned certifies that on this day she delivered by  U.S. mail or ABC-LMI delivery to the attorney of record for the appellant and appellant c/o his or her attorney or to the attorney of record for the respondent and respondent c/o his or her attorney true and correct copies of the document to which this certificate is attached. This statement is certified to be true and correct under penalty of perjury of the laws of the State of Washington. Signed at Tacoma, Washington, on the date below.

1-26-12   
Date Signature

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**To:** Therese Nicholson-Kahn  
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**Subject:** RE: In Re: The PRP of Jackson, Jr. case no. 82363-4, consolidated w/ In RE: The PRP of Rivera, no. 83923-9

Rec. 1-26-12

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**From:** Therese Nicholson-Kahn [<mailto:tnichol@co.pierce.wa.us>]  
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**Subject:** In Re: The PRP of Jackson, Jr. case no. 82363-4, consolidated w/ In RE: The PRP of Rivera, no. 83923-9

Please see attached the State's Statement of Additional Authority in the below stated matter:

In Re: The PRP of Jackson  
No. 82363-4 (Cons. w/ 83923-9)  
Submitted by: K. Proctor  
WSB # 14811  
e-mail: [Kprocto@co.pierce.wa.us](mailto:Kprocto@co.pierce.wa.us)

Please call me at 253/798-7426 if you have any questions or concerns regarding this matter.

Therese Kahn  
Legal Assistant to K. Proctor